

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMTAX HOLDINGS 260, LLC, an Ohio
limited liability company, AMTAX
HOLDINGS 114, LLC, an Ohio limited
liability company, and ALDEN TORCH
FINANCIAL LLC, a Delaware limited liability
company,

Plaintiffs,

v.

WASHINGTON STATE HOUSING
FINANCE COMMISSION, a public body
corporate and politic of the State of
Washington, BILL RUMPF, an individual,
LISA J. BROWN, an individual, DIANE
KLONTZ, an individual, DUANE
DAVIDSON, an individual, JASON
RICHTER, an individual, RICH NAFZIGER,
an individual, ALBERT TRIPP, an individual,
RANDY ROBINSON, an individual, ALISHIA
TOPPER, an individual, LOWEL KRUEGER,
an individual, KEN A. LARSEN, an individual,
and WENDY L. LAWRENCE, an individual,

Defendants.

No. 2:20-cv-01698-BJR

DECLARATION OF TAKI FLEVARIS
IN SUPPORT OF MOTION TO
DISMISS

1 I, Taki Flevaris, declare as follows:

2 1. I am a partner at Pacifica Law Group LLP and represent the Washington State
3 Housing Finance Commission (the "Commission") in this matter. I am over 18 and make this
4 declaration based on personal knowledge.

5 2. Attached as **Exhibit A** is a true and correct copy of excerpts from the Commission's
6 current 9% Competitive Housing Tax Credit Policies, adopted on February 25, 2021, and available
7 on the Commission's website at <http://wshfc.org/mhcf/9percent/index.htm> (click "Approved 9%
8 Policy for 2021").

9 3. Attached as **Exhibit B** is a true and correct copy of excerpts from the Commission's
10 current Bond/Tax Credit Program Policies, adopted on February 25, 2021, and available on the
11 Commission's website at <http://wshfc.org/mhcf/4percent/index.htm> (click "Bond-Tax Credit (4%)
12 Policy").

13 4. Attached as **Exhibit C** is a true and correct copy of the current version of Chapter
14 9 of the Commission's Tax Credit Compliance Procedures Manual, which was updated in March
15 2021 to reflect the revisions to the Commission's Tax Credit Policies adopted on February 25,
16 2021. This current version of the Tax Credit Compliance Procedures Manual is available on the
17 Commission's website at: <http://wshfc.org/managers/ManualTaxCreditIndex.htm>.

18 5. Attached as **Exhibit D** is a true and correct copy of the Financial Solvency and
19 LIHTC History form referenced in Exhibits A-C, which was reviewed and approved by the
20 Commission when it adopted the current Tax Credit Policies on February 25, 2021. The form is
21 available on the Commission's website at: <http://wshfc.org/managers/ManualTaxCreditIndex.htm>
22 (under Chapter 9).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

s/ Taki V. Flevaris
Taki V. Flevaris, WSBA No. 42555

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2021, I electronically filed the foregoing document with the Court ECF system, which will send notification of such filing to all counsel of record.

Dated this 19th day of March, 2021.

s/ Thien Tran
Thien Tran, Paralegal/Legal Assistant